



DEPARTMENT OF THE AIR FORCE
WASHINGTON, DC

14 MAY 2003

Office of the Assistant Secretary

MEMORANDUM FOR ALMAJCOM/CE
USAFA/CE

FROM: SAF/IEI
1665 Air Force Pentagon
Washington, DC 20330-1665

SUBJECT: Policy on Addressing Lead-Based Paint Hazards in Air Force Military Family
Housing Approved for Privatization

Protecting Air Force personnel and their families from lead-based paint hazards ("LBPH")¹ in military family housing ("MFH") is among our highest priorities. This applies equally with respect to members and their families living in privatized MFH. Accordingly, installations shall take all steps necessary to protect Air Force personnel and their families from LBPH in MFH identified for privatization.

Installations shall structure privatization transactions to require the developer to manage any lead-based paint ("LBP") and abate any LBPH. The HUD regulations provide a useful guide to such management and abatement. Therefore, as a matter of policy, installations shall structure privatization transactions to require the developer to address LBP and LBPH in MFH privatization projects in a manner that is consistent with the HUD regulations, including the actions set forth in Subpart C of the HUD regulations. The developer shall abate LBPH at the point of a change of occupancy if there is one or, if there is no change of occupancy, at the time of a renovation/demolition scheduled in the transaction, or on a more aggressive schedule if the developer desires.

Whether subject to privatization or not, installations already should have identified, evaluated and controlled or eliminated existing LBPH.² Accordingly, installations and developers should consider actions taken in the past to address lead-based paint when determining what actions are necessary under this policy.³

¹For purposes of this policy, the term LBPH has the same definition as that used in lead-based paint regulations issued by the U.S. Department of Housing and Urban Development, at 24 CFR Part 35 (*Lead-Based Paint Poisoning Prevention in Certain Residential Structures*) (the "HUD regulations"). It means any condition that causes exposure to lead from dust-lead hazards or soil-lead hazards, or lead-based paint that is deteriorated or present in chewable, friction or impact surfaces, and that would result in adverse human health effects.

² Air Force Policy and Guidance on Lead-Based Paint in Facilities (HQ USAF/CC; 24 May 1993).

³ Where lead-based paint activities are conducted, EPA work practice and certification standards are set forth at 40 CFR § 745.227.

Sources of Funding to Address Lead-Based Paint

Installations may use "Project 727" funds to evaluate the condition of lead-based paint, *e.g.*, to inspect and conduct risk assessments and other studies. Project 727 funds may not be used to abate LBPH; rather installations may use "Project 722" funds for abatement.⁴

Compliance with this policy will assist installations in protecting the health and safety of Air Force personnel and their families as we proceed with privatizing MFH. Please direct any questions to Colonel Edward Pokora of my office at (703) 697-7003.



FRED W. KUHN

Deputy Assistant Secretary of the Air Force
(Installations)

cc:
HQ USAF/ILE
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⁴ Air Force Manual 65-604 (1 Oct. 2002).